

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

- - - - -

Tamara K. Alsaada,	:	
et al.,	:	
Plaintiffs,	:	
vs.	:	Case No. 2:20-cv-3431
	:	Judge Marbley
	:	Magistrate Judge Jolson
City of Columbus,	:	
Ohio, et al.,	:	
Defendants.	:	

- - - - -

30(b)(6) DEPOSITION OF LIEUTENANT PAUL WEINER
VIA VIDEOCONFERENCE

- - - - -

Taken at Columbus City Attorney's Office
77 North Front Street, 4th Fl.
Columbus, OH 43215
February 9, 2021, 2:22 p.m.

- - - - -

Spectrum Reporting LLC
400 S. Fifth Street, Ste. 201
Columbus, Ohio 43215
614-444-1000 or 800-635-9071
www.spectrumreporting.com

- - - - -

A P P E A R A N C E S

ON BEHALF OF PLAINTIFFS:

Marshall and Forman, LLC
 250 Civic Center Drive, Ste. 480
 Columbus, OH 43215
 By Edward R. Forman, Esq.
 Madeline J. Rettig, Esq.
 (Via videoconference)

ON BEHALF OF DEFENDANTS:

Columbus City Attorney's Office
 77 North Front Street, 4th Floor
 Columbus, OH 43215
 By Alana Valle Tanoury, Esq.
 (Via videoconference)

I N D E X

Examination By	Page
Mr. Forman - Cross	5
(No exhibits were marked.)	

Tuesday Afternoon Session

February 9, 2021, 2:22 p.m.

S T I P U L A T I O N S

It is stipulated by counsel in attendance that the deposition of Lieutenant Paul Weiner, a witness herein, called by the Plaintiffs for cross-examination, may be taken at this time by the notary pursuant to notice and subsequent agreement of counsel that said deposition may be reduced to writing in stenotypy by the notary, whose notes may thereafter be transcribed out of the presence of the witness; that proof of the official character and qualification of the notary is waived.

THE REPORTER: Before I swear the witness, would counsel please identify themselves for the record, state who they represent, identify who else is in the room with them, and express your stipulation that this deposition may take place with a remote administration of the oath and remote reporting of the deposition.

MR. FORMAN: Hi. Thank you. My name is Ed Forman. And there's nobody in the room with me. I believe that Mattie Rettig from my office is here as well. And, yeah, we do so stipulate. We're here on behalf of the plaintiffs.

MS. TANOURY: Hi. Alana Tanoury here on behalf of the defendants. I am alone in my office, and Lieutenant Weiner is also at the City Attorney's Office but in a separate conference room. And we stipulate to the taking of the oath virtually.

LIEUTENANT PAUL WEINER
 being first duly sworn, testifies and says as follows:

1 CROSS-EXAMINATION

2 BY MR. FORMAN:

3 Q. Hi. Thank you. Could you begin by
4 stating your name for the record?

5 A. It's Lieutenant Paul Weiner,
6 W-E-I-N-E-R.

7 Q. Thank you, Lieutenant Weiner. I met
8 you briefly off the record there a second ago.
9 And I am just going to be asking you a series of
10 questions today. I'm going to try to keep it as
11 quick and painless as I possibly can.

12 And I am just going to begin with a
13 couple of preliminary questions. The first is
14 that I -- I can at times talk a little bit
15 quickly. So if you don't understand a question, I
16 ask, feel free to tell me that and tell me to stop
17 or say it again or rephrase it. It won't bother
18 me in the slightest.

19 A. Okay. Understood.

20 Q. Thank you.

21 And if you don't -- if you do answer a
22 question, I'm going to assume that you understood
23 it; is that okay?

24 A. Yes.

1 be a problem. So I'm going to see what I can do
2 to turn that up if that's all right with you.

3 A. Okay.

4 MS. TANOURY: I can come check -- can
5 we go off the record for a second?

6 MR. FORMAN: Oh, sure.

7 (A short recess is taken.)

8 BY MR. FORMAN:

9 Q. Yeah. Please just let me know if you
10 can't hear. Just, you know, just tell me and
11 we're happy to deal with it at that point.

12 A. Okay.

13 Q. And I believe you said your present
14 employer was the Columbus Division of Police,
15 right?

16 A. Yes, sir. That's correct.

17 Q. I know that you're a lieutenant. Do
18 you supervise any particular area?

19 A. Yes. I'm the traffic operations
20 section lieutenant, so freeways, motorcycles,
21 commercial enforcement, OVI enforcement.

22 Q. Okay. Who do you presently report to
23 you?

24 A. My boss is commander Terry Moore,

1 Q. And you are doing a great job with this
2 already. You probably have been deposed before
3 and, you know -- but I don't know. But you're
4 doing a great job with this already. But we can
5 only take down verbal statements here. A nod of
6 the head or a shaking of the head, I'll probably
7 understand what you mean, but it won't be clear
8 for the record. So the court reporter may ask you
9 to clarify something for that, if that's okay.

10 A. Understood.

11 Q. I ask this question of absolutely
12 everybody. It has nothing to do with you
13 individually. But have you taken any medication
14 or have a health issue today that would inhibit
15 your memory?

16 A. No, I have not.

17 Q. Okay. Who is your present employer?

18 A. I'm sorry?

19 Q. Who is your present employer?

20 A. Yeah. The volume is just minimal. I
21 can hear you, but I -- it's 100 percent on my end.
22 But my present employer is City of Columbus,
23 Division of Police.

24 Q. Do you know what, I don't want this to

1 traffic bureau commander.

2 Q. And so I get a little bit more of a
3 feel for the structure, who reports to you?

4 A. So I have six sergeants. So the first,
5 second and third shift freeway patrol, two
6 motorcycle unit sergeants, and an OVI enforcement,
7 we call him OVI countermeasures/training sergeant.
8 And then within -- under those sergeants, there
9 are approximately 45 officers.

10 Q. Okay. Thank you.

11 You are here today because you are
12 designated by the City of Columbus to speak on a
13 couple of issues on behalf of the City under a
14 Rule of Civil Procedure called 30(b). And I'm
15 just going to tell you that you were identified as
16 speaking to mutual aid agreements regarding
17 traffic on behalf of the Division of Police. And
18 essentially, what we had asked for was somebody
19 who can speak to the arrangements between CDP and
20 law enforcement personnel from mutual aid entities
21 to police demonstrations after the killing of
22 George Floyd on May 5th, 2020, including
23 compliance with CDP policies, such as the use on
24 nonlethal force cameras and being readily

1 personally -- identifiable onlookers. You were
2 designated as speaking to all of that. You are
3 exclusively designated as speaking to mutual aid
4 regarding traffic. Is that something that you are
5 prepared to testify to today?
6 A. I believe I am, yes.
7 Q. Okay. So can you just tell me a little
8 bit, just kind of give me an overview of -- you
9 know, maybe it's not a great way of asking. But,
10 you know, you supervise these individuals. But
11 what is your department mostly in charge of? I
12 know you mentioned OVI enforcement and some other
13 things, but --
14 A. So day-to-day operations I have three
15 shifts of freeway patrol, first, second and third
16 shift. They patrol the entire city freeway
17 system. Two shift of motorcycles, a first shift
18 and what we call day mid watch, so roughly the
19 hours of 6:30 to 6:30, about 17 motor officers and
20 two sergeants. Two commercial enforcement vehicle
21 officers. And then an OVI countermeasures
22 sergeant. So in other words, I oversee the OVI
23 countermeasures for the entire division, but I
24 only have a single supervisor that kind of is the

1 Q. Got it. You're more implementation?
2 A. Yes, sir.
3 Q. Okay. No worries. I'm going to do
4 that about 16 more times myself, so it's all
5 right.
6 Taking a look at that then, I had
7 mentioned incidence where traffic was closed down.
8 And you said you did have some involvement in
9 that. Can you tell me a little bit more about
10 that?
11 A. Yeah. It's a wide-ranging thing. But
12 generally on the freeway systems, whenever there's
13 -- we call it a TERT closure, a traffic emergency
14 response event, a fatal crash, a HAZMAT incident,
15 something that's going to result in the closure of
16 a main arterial street, a freeway, a secondary
17 road for more than two hours, 24 hours a day I
18 would be notified to respond and help coordinate
19 the traffic patterns around that issue or
20 incident.
21 Q. Okay. Okay. Could you give me an
22 example of what sort of an incident might cause
23 something like that?
24 A. Oh, a fatal traffic crash, a traffic

1 coordinator trainer for those programs.
2 Q. And forgive me. I'm just ignorant of
3 the way in which the police would handle traffic
4 in a city. So you've got these individuals
5 reporting to you. I mean, are you involved --
6 let's go ahead and strike all that.
7 But are you involved, for example, in
8 the planning of traffic patterns throughout the
9 city?
10 A. Yeah. I sit in a lot of meetings with
11 various traffic entities, respond to major
12 crashes, those types of things.
13 Q. Got it.
14 Would it fall within your purview to be
15 involved in shutting down various streets and
16 certain events?
17 A. Absolutely.
18 Q. Okay. Are you involved in I guess I
19 would say the creation of policy with regard to
20 how traffic in the city is handled?
21 A. I would say no, I'm not involved with
22 policy. I do attend a lot of meetings and I get
23 to weigh in on some things. But I'm not in charge
24 of policy at large.

1 crash involving a hazardous materials spill, a
2 truck striking a bridge on a secondary road. Say
3 Broad Street under Glenwood, a truck strikes the
4 bridge, and we're going to close the bridge for
5 three hours while the engineers come out to look
6 at the bridge to determine the structural
7 soundness of the bridge, so we -- I would be -- if
8 it's more than two hours and it's a major arterial
9 street, I would come in to help arrange the
10 detours around that.
11 Q. Great.
12 I should probably ask this, when you
13 say "secondary road," could you tell me what that
14 means? I can guess at it, but I don't want to be
15 wrong.
16 A. Yeah. I'm talking other than
17 residential streets. You know, like main
18 thoroughfares, arterial streets, Morse Road,
19 Cleveland, Broad Street, those types of streets.
20 Individual neighborhoods is something that a
21 patrol officer would handle or his supervisor
22 would handle.
23 Q. Got it.
24 So you're notified about something like

1 that. Are there any official city policies with
2 regard to when traffic gets shut down in
3 particular events?

4 A. We have a Traffic Emergency Response
5 Team and there's policies regarding that team,
6 yes.

7 Q. I know you get notified if it's going
8 to be more than two hours. If it's going to be
9 less than that, who would have the -- well, I
10 guess you wouldn't be notified. Who would be in
11 charge of that? Is that a fair question or --

12 A. Well, I mean, in a nutshell, the first
13 responding supervisors and/or their lieutenants
14 would be responsible for a closure until the point
15 they notified me of the closure. I get notified
16 all the time of things that are less than two
17 hours, you know, an hour and a half, you have a
18 really serious injury crash and they're debating
19 whether they're going to hold it as a fatal crash,
20 and that will determine if accident investigation
21 is going to come out and do an investigation
22 that's going to last two more hours. But they a
23 lot of times notify me before they get the updated
24 condition at the hospital. So the victim's

1 course. If it happens at, say, 161 and 71 north,
2 we would come all the way back down to 670 and
3 shut it off to keep traffic on the freeway system.
4 Because I can't dump all of 71 north traffic onto
5 17th or Hudson or Morse Road. So we try to shut
6 it off at a freeway. If we can't do a freeway,
7 the next major option would be a state route. So
8 if you are coming into the city say from the west
9 side, your 70 east, and there's a crash before
10 Rome-Hilliard Road, we would go all the way out
11 into Madison County, reach out to our partners at
12 Ohio State Highway Patrol and Madison County
13 Sheriff's Office, and put traffic off at State
14 Route 142, because we can't put all of 71 east
15 onto Rome-Hilliard Road.

16 Q. Got it. That makes sense. As someone
17 who used to live next to Hudson and 71, I'm quite
18 appreciative of that as well.

19 A. Now, I would also add, though, that
20 secondary roads, arterial streets would be a
21 different scenario because we don't have to do it
22 that way. But we have to -- wherever we're
23 detouring the traffic has to be able to handle the
24 volume of traffic. If we're going to put traffic

1 transported in critical condition, but upon
2 arrival at the hospital it's determined that
3 they're going to survive, so accident
4 investigation is not coming out. So an hour and a
5 half into this, we release it and I don't even
6 respond. If it's determined it is going to be
7 life threatening and then AIU is going to respond,
8 then I would respond.

9 Q. That makes sense. So when we talk
10 about closing down traffic, I'm just going to try
11 to get my head around the concept a little bit.

12 I guess in the incident you're saying,
13 I don't know, a fatal wreck on a freeway if that
14 makes sense. How would traffic be dealt with at
15 that point if it's going to be closed down?

16 A. So as a general rule on freeways -- in
17 Columbus, we're kind of fortunate. There are so
18 many highways that run through Columbus, if it's
19 going to be more than a two hour closure, we
20 generally go back to the junction of another major
21 freeway. So if it's 315 northbound at Goodale, we
22 would go back to 315 and 70 and shut it down. And
23 we shut it at a major freeway because we have
24 oversized trucks, HAZMAT loads that can't go off

1 off of Broad Street into a neighborhood street,
2 it's got to be able to handle that kind of volume
3 of traffic.

4 Q. Yeah. That's a good starting point.
5 So we can probably talk about secondary roads
6 then. So taking us off of the freeway, say we
7 have -- I don't know -- we've got a bad situation
8 at -- I don't know, let's say Summit and Fifth or
9 something like that. How would you -- how would
10 you go into looking about how to reroute traffic
11 for something like that?

12 A. Same kind of general principle, but we
13 might cut it off at Fourth, you know, in a --
14 we'll try to use some kind of main thoroughfares
15 to keep traffic flowing as best we can. We have
16 to be cautious in neighborhoods because we have
17 people that live in the neighborhood. So the
18 bigger out we make the closures, the more
19 difficult filtering of traffic we have to do to
20 get them into the affected area.

21 MS. TANOURY: Hey, Ed -- and I'm giving
22 leeway here to get into the background of what he
23 does. But we're kind of off topic from what he's
24 designated for.

1 MR. FORMAN: Okay. Well, I guess in
2 order to -- you know, get the understanding of
3 when we have people coming in to help out with the
4 traffic, I kind of have to get my head around
5 traffic a little bit, so --

6 MS. TANOURY: That's fine.

7 BY MR. FORMAN:

8 Q. Okay. All right. So I'm just going to
9 give you an example of just a standard toxic waste
10 spill in the city -- I don't know -- some
11 secondary road somewhere. Just walk me through
12 that process. Once you're notified of a spill,
13 what are the practical steps, the first thing that
14 your department would be doing?

15 A. So that's a different scenario as well
16 because now we're going to rely on fire to tell us
17 what the scenarios -- what the shutdown is going
18 to be. So it's going to depend on what type of
19 chemical is spilled, what direction is wind is
20 coming. The fire chief or the fire boss is going
21 to tell me or a patrol lieutenant, hey, we need
22 eight blocks south and four blocks west as a
23 containment area because of the HAZMAT of the
24 fallout. So that's going to be a different

1 opened up as fast as we can, you know, barring
2 injury and that kind of thing. If it's blocking,
3 they may shut down High Street just between the
4 affected area of where the crash is. But as
5 traffic starts to back up and they start to
6 realize that this isn't going to be a five-minute
7 closure, they may notify their sergeant. Their
8 sergeant may come out and say, hey, let's close
9 northbound High Street at State Street, let's
10 close southbound High Street at Gay or whatever
11 street they determine, and they'll try to -- and I
12 would do the same thing. Try to figure out how
13 we're going to route traffic around this problem.
14 So we're going to send traffic northbound west on
15 -- I'm sorry, east on State to north Third Street
16 and then continue up north to Broad Street and
17 then continue from there, or southbound the same
18 thing.

19 And then depending on the length of the
20 closures depend on how involved it gets. Usually
21 if we call the Traffic Emergency Response Team,
22 the thing I bring to the table that patrol doesn't
23 have is I work with traffic engineering very
24 close, so I can get barricades and sign boards and

1 scenario than just traffic. Now, we do those as
2 well, but that's going to be based on fire's
3 recommendation.

4 Q. Okay. We'll just call it an accident
5 where something gets -- something gets -- you
6 know, it's not a -- let's get away from hazardous
7 waste then.

8 So just say it's an accident and it's
9 closed down an intersection and it's reported
10 there's an officer on the scene. What are the
11 steps that happen from there?

12 A. I'm not sure of the question exactly.

13 Q. Yeah. No problem.

14 So I'm just trying to get -- so say
15 there's a traffic crash in the middle of say Broad
16 and High. And what happens? I assume that police
17 get called to the scene. But I'm just trying to
18 figure out the steps that the police department
19 would take. Like is it originally dealt with by
20 the first officer who arrives? How does it work?

21 A. Yeah, absolutely. The first responding
22 officer will see if they can take care of it. We
23 generally have what's called a quick clear policy
24 in the division, so we try to get the street

1 cones and those types of things.

2 Q. Okay. Tell me a little bit more about
3 that. What is the process of actually blocking
4 off a street, like, when you get involved?

5 A. Well, I mean, generally it's a cruiser,
6 or at least when I get there. But again for
7 long-term closures, particularly on the freeway,
8 that's -- it's not safe. So we want to get some
9 arrow boards out there, we want to get -- you
10 know, if you are going to close a freeway lane, we
11 want about a half a mile of cones. There's
12 actually NHTSA rules about how to do that. So
13 we'll call in ODOT or city traffic engineers,
14 they'll bring crews out with arrow boards, extra
15 cones, extra barrels, and we'll do the closures
16 according to the NHTSA guidelines if it's going to
17 be more than two hours. It's got to be worth the
18 time to set it all up. We don't want to set it
19 all up and immediately tear it back down. But we
20 try to make it as safe as we can. So, you know,
21 we'll replace the cruisers with maybe a road
22 closed sign, but we'll still man the road closed
23 sign with the cruiser to make sure that it's
24 enforced.

1 Q. Okay. Are there any -- I guess maybe I
2 want to use term pre-plans essentially. But are
3 there any, you know, plans in place? You know, I
4 think like, for example -- an example you used is
5 we're going to have something nasty that happens
6 on 71 at, say, like, 17th or something like that.
7 Are there existing plans in place that say, all
8 right, if we have a traffic accident in this area
9 and we need to reroute people, here is how we are
10 going to do it?

11 A. There are not for traffic accidents.
12 There are for other things. We do presidential
13 visits and vice presidential visits, so
14 motorcades.

15 Q. Right.

16 A. We always pull out old plans,
17 especially if we're going to similar locations or
18 we're going to use some parts of the -- some legs
19 of the same original plan. So we'll use that as a
20 starting point. During the protest, for example,
21 I created two or three traffic plans for the
22 statehouse and city hall that we could use on a
23 recurring basis and that could be used when I
24 wasn't there.

1 But generally speaking, we evaluate
2 each situation because they're always different.
3 It's hard to say you're going to have -- this is
4 the plan for 71 and Morse because you don't know
5 if there's going to be HAZMAT involved in it or
6 the length of the closure and all of those kind of
7 things. But like I mentioned earlier, we operate
8 under the philosophy that we're going to try to
9 close a freeway at a freeway.

10 Q. Got it. Now, that's very helpful.
11 Thank you.

12 You had mentioned that you had put in
13 some plans during the protest. Are you referring
14 to the protests in late May and early June?

15 A. I am, sir.

16 Q. Okay.

17 A. Actually all year for all of 2020.

18 Q. Okay. So can you tell me a little bit
19 more about those plans. Like how are they
20 created? Who was involved?

21 A. Yeah. Early during the protests in
22 May and the first part of June, I was literally
23 there 16 hours a day, so I would coordinate those
24 plans if need be. Actually, we did different

1 plans for that, so I'm sure you'll get to that.

2 But as things kind of quieted down and
3 the protests became more of a weekend event, you
4 know, like, a planned -- we know there's going to
5 be a protest at the statehouse on Saturday. As a
6 matter of fact, there was one today. So in the
7 emergency operations center there's -- I have a
8 traffic plan for the statehouse that predesignates
9 10 traffic posts, 20 traffic cones, four road
10 closed signs. And whether I'm there or not, any
11 commander or deputy chief would be able to look at
12 that and say I need 10 cars at these locations,
13 and then they would call me and I would call city
14 traffic engineers to get the four road closed
15 signs and the 20 traffic cones. For a protest at
16 the statehouse, generally we're not going to shut
17 traffic down unless the protest spills into the
18 street and becomes dangerous to the protesters or
19 the motoring public. At that point, though, we
20 predesignated where we would close off a protest
21 that's limited to the area around the statehouse.

22 Q. So you mentioned you created these
23 plans. And do you know when -- I mean, I want to
24 say the protest began on May 28th. Do you know

1 how quickly you put those plans together or --

2 A. So we have totally different plans that
3 we used in May and June, which were much bigger,
4 much more labor intensive. The plan I just
5 described to you with the 10 traffic posts
6 probably wasn't born until about August when this
7 was -- when it was obvious we were going to
8 continue to have protests, and I can't be here
9 seven days a week.

10 Q. Right.

11 A. Chief Woods asked me at the time if I
12 could create a plan to put up in the EOC that all
13 the commanders could have. It's kind of like
14 traffic for dummies, for lack of a better way to
15 say it. But it literally shows post 1310, it's on
16 a map, it's colored, numbered. So you can look
17 right at it and go post 2 is right here, and
18 there's one intersection at Gay and Third that's a
19 little bit complex that takes 20 traffic cones.
20 So it's a diagram of the traffic cone pattern, and
21 then the four places we'd put road closed signs up
22 if it was going to last very long.

23 Q. Got it.

24 Do you know approximately when Woods

1 asked you to do that?

2 A. No. It was just we were in meetings
3 constantly about protests. And at some point I
4 couldn't be there on a Saturday and Chief Woods
5 was a deputy chief at the time and he said, hey,
6 could you put a plan together that patrol could
7 just initiate, like, without calling in traffic
8 resources spontaneously? And I said yes, sir.
9 And that's how that particular plan was born. And
10 then there's a spinoff of it for the city hall
11 that adds three more traffic posts that would
12 incorporate the area around city hall as well.

13 Q. Okay. And do you know if that Saturday
14 was just a few days after the protests began or
15 was it further down the road than that?

16 A. No, it was definitely sometime late
17 summer, mid to late summer. It had nothing to do
18 with the initial first six weeks of the protest or
19 riots. Now, I do have plans for that period of
20 time as well.

21 Q. What do you mean by that?

22 A. Well, I mean, there are -- there are
23 plans that we used during the actual rioting and
24 protesting that we repeated, and I have those

1 Q. All right. "Innocent traffic" is my
2 phrase for the day. Thank you very much for that.
3 That was awesome.

4 All right. So in terms of where you
5 get -- I guess let me see if I'm getting at this
6 well. But I assume that implementation of a plan
7 like this, like the one you were just describing
8 on the numerous city blocks, was that downtown by
9 the way?

10 A. I'm sorry. Was the traffic pattern
11 downtown?

12 Q. I'm so sorry. I confused this and then
13 I started talking about innocent traffic.

14 But you had mentioned at one point
15 there was a large, large area sectioned off to
16 deal with the protests. Was that downtown?

17 A. Yes, sir.

18 Q. Okay. Do you know if it included the
19 intersection of Broad and High?

20 A. Oh, absolutely.

21 Q. Okay. Do you have any idea how far
22 north it went from that or --

23 A. Well, starting on the second day of the
24 riots, so May 29th, we did an inner perimeter

1 plans as well. That's a different animal, but I
2 have those plans.

3 Q. Are those plans in writing anywhere or?

4 A. Yes.

5 Q. And those are sort of put together more
6 on the fly, is that --

7 A. Well, in the case of the riots, they
8 were put together on the fly. And what ultimately
9 we had to do is we tried for a couple days to just
10 keep a perimeter around protesters and rioters
11 that was always in a state of movement, and it was
12 nearly impossible to do. At some point we decided
13 we had to put a -- like, a solid perimeter around
14 about a 15-square block area. And the goal being
15 to, A, protect the protesters and the -- and the
16 police and, B, to turn innocent traffic out of the
17 area. Because we couldn't just have traffic
18 flowing in the area and then getting bottlenecked
19 and getting caught in these roving protests. And
20 then we also have to provide ingress and egress
21 for fire and medics and things like that. So we
22 had to at some point start doing some kind of
23 traffic containment for a larger area around the
24 statehouse.

1 between Spring Street and 70 and 315 to the west
2 and Fourth Street to the east. And then starting
3 on the third night, we expanded that. We'd kept
4 that inner perimeter we called it and we expanded
5 an outer perimeter clear out to the inner belt, so
6 670, 70, 71 and 315. Not all day, but during --
7 during peak protest riot hours, you know, when we
8 needed to.

9 Q. Got it.

10 Peak protest is good.

11 A. Yeah. Peak hours.

12 Q. Peak hours.

13 Do you have any idea when those peak
14 hours -- oh, does peak hours mean something to
15 you? Is it a particular period of time or is it
16 just --

17 A. No. Well, it's kind of mission
18 critical. So like the second night when we first
19 established the inner perimeter, it was because we
20 couldn't get control of the downtown area.
21 Rioters were being resupplied by vehicles driving
22 into the area. We had SUVs, dirt bikes, cars
23 doing doughnuts, operating recklessly, tearing up
24 the Columbus Commons. And they were putting

1 everybody at risk in the downtown area. So that's
 2 when we decided we had to, like, lock down that
 3 area I just described to you to prevent any
 4 vehicle traffic from getting in or out, except for
 5 police, fire and the media and a few nonessential
 6 people. Like Grant Hospital was caught up in
 7 parts of that. Like somebody might have an
 8 emergency --
 9 Q. Sure.
 10 A. -- so we had to obviously let those
 11 people through. But that was set up based on the
 12 necessity of the situation. As the days
 13 progressed, we generally briefed a roll call at
 14 5:30, not every day but some days, with the mutual
 15 aid officers and the traffic officers and the
 16 National Guard. And then we implemented the
 17 traffic plan generally around 7:00, but it was
 18 always on the approval of the incident commander
 19 when he felt it was necessary. So sometimes a
 20 little later, sometimes a little faster.
 21 Q. Okay.
 22 A. Based on the crowd being in the street,
 23 you know, on one of the days just as an example,
 24 crowd size was estimated as 5,000 people, and they

1 were walking through -- you know, northbound on
 2 High Street, northbound on Fourth Street, Spring
 3 Street, going the wrong way against traffic and
 4 totally gridlocking traffic and traffic motorists,
 5 so that was a day we were trying to rush to get it
 6 out.
 7 Q. Got it. Thank you. That's very
 8 helpful.
 9 Do you know -- I guess I'm just going
 10 to ask you sort of about the level -- we're going
 11 to be talking a little bit about bringing in other
 12 departments in a little bit. But I'm just trying
 13 to get a feel for the amount of officers that
 14 would be involved in setting up a plan like that.
 15 I guess the person power -- maybe you understand
 16 what I'm talking about. But the level of effort I
 17 guess is what I would say.
 18 A. Yeah. I mean, I'd almost have to walk
 19 you through the timeline of how it evolved if
 20 that's what you're asking me to do.
 21 Q. Sure. We could try that a little bit.
 22 I mean, do you remember, for example, on the 28th
 23 eventually a plan was implemented? That's the
 24 first night of the protests, a Thursday.

1 A. Yeah. But -- yes, that was the first
 2 night of the plan -- that was the night I was
 3 called into work about 8:30 that evening. On my
 4 way in, I started understanding the gravity of the
 5 situation. I was listening to the radio and I
 6 could hear what was going on. I called in from
 7 home nine motorcycle officers and the two
 8 motorcycle sergeants. I had on duty second shift
 9 freeway. And then at 9:30 at night, I pulled in
 10 third shift freeway to come on duty and I held
 11 second shift overtime. Had about 30 traffic
 12 officers and myself. And that entire night until
 13 about 5:30 in the morning, we essentially just
 14 worked to keep a perimeter around the moving riots
 15 to keep innocent traffic turned out of the area
 16 and to try to protect the flanks of the officers
 17 and the crowds to prevent cars from driving into
 18 the crowds at high speeds or being operated
 19 recklessly or resupplying the rioters.
 20 Late that night we tried to put an
 21 impromptu inner perimeter together like I
 22 described to you earlier, Spring Street to 70.
 23 And this was probably 2:30, 3:30 in the morning,
 24 315 to north Fourth Street. But I only had 30

1 people, so we couldn't cover alleys and parking
 2 lots and, you know, you -- cars can still come in
 3 and get out. We just -- we tried to do the best
 4 we could. And I tried to keep officers still with
 5 the moving field forces and -- and rioters, and it
 6 was -- it was extremely difficult to do.
 7 On the second night, so Friday night
 8 the 29th, came back in at, like, 1:00 in the
 9 afternoon, watched it develop all day long, tried
 10 the same plans we tried the night before.
 11 Somewhere close to midnight it was totally out of
 12 control, there -- people were just -- you know,
 13 things were burning, there was looting going on.
 14 And it was widespread, it was all over from
 15 Bicentennial Park clear up to Spring Street and
 16 from, you know, city hall east to Fourth and Fifth
 17 Streets. And it was very, very widespread. It
 18 was nearly impossible to keep any kind of a
 19 perimeter around that.
 20 One of the patrol lieutenants called
 21 and said, hey, can you shut down traffic to the
 22 part of the downtown area to this? And I said I
 23 couldn't do it with the number of people I had.
 24 And I did not want to pull patrol officers out of

1 field forces to come work traffic.

2 I ended up going to the emergency
3 operations center with all the bosses and outside
4 agencies that were there, which was, like,
5 Franklin County and Ohio State Highway Patrol,
6 Fire, other agencies. We had a meeting about it.
7 I suggested and it was discussed reaching out for
8 mutual aid, got approval from the incident
9 commander. That night we reached out I think we
10 had approximately 24 mutual aid officers respond.

11 I had them meet offsite in a lot next
12 to Vets Memorial west of downtown. When I say we,
13 that night I did not go out on the briefing, my
14 sergeants did because it was a very fluid,
15 evolving emergency. But they met them there and
16 kind of briefed them, recorded what agencies were
17 there. And it wasn't like we assigned them to
18 traffic posts, but we wanted to, like, lock down
19 that inner perimeter that I described to you. So
20 we put them in, like, 10-cruiser convoys, and then
21 my -- two of my sergeants led them around in a
22 line and literally would come to a parking lot and
23 said you're going to be here in this parking lot,
24 no southbound traffic, take the next one to the

1 so no traffic could exit off of 670, 70 or 71 or
2 315 on into downtown, and we closed all the
3 secondary roads. And unless you had a place to
4 be, an address, you know, you had to be at work,
5 had to go to the hospital, we turned you away from
6 downtown. No deliveries. No Uber. No Uber Eats.
7 You know, no random vehicles that didn't have a
8 reason to be in the downtown area. We were less
9 stringent on the outer perimeter and more
10 stringent on the inner perimeter. The inner
11 perimeter was pretty strictly police, fire, media,
12 and anybody that had to absolutely be in the area,
13 a resident, somebody going to the hospital,
14 something like that.

15 Q. Okay. Thank you.

16 Just I think you mentioned that's the
17 third day of the -- of what was happening. So do
18 you have any idea -- I know you said that started
19 around, like, 1:00 p.m. Do you have any idea if
20 High Street was ever closed down during that time
21 period or any portion before it, before that time?

22 A. I'm sorry. What are you saying started
23 at 1:00 p.m.?

24 Q. Well, no. I'm so sorry. I think you

1 alley. You're going to be here in the alley, no
2 southbound traffic. My traffic guys took the
3 major intersections. We used all of those mutual
4 aid cars to plug the gaps.

5 Q. Got it.

6 A. That was Day 2.

7 Day 3 it was obvious in the afternoon
8 it was growing and was potentially going to be a
9 bigger problem, so that would have been Saturday
10 night. And I came in early in the afternoon, and
11 through discussions in the afternoon got approval
12 from the incident demand commander to make the
13 mutual aid request earlier in the day. And that
14 day was the largest response we had for mutual aid
15 cruisers, which was about 96 I think was about the
16 number.

17 Q. Wow. Okay.

18 A. So 96 officers and/or cruisers. And
19 then starting Sunday, the National Guard had --
20 now starting Saturday night, the Mayor declared an
21 emergency. And so starting that night when we had
22 the 96 officers, based on the emergency, we
23 decided to do an inner perimeter and an outer
24 perimeter. So we moved it out on the inner belt,

1 had mentioned that you originally sought mutual
2 aid, bringing more people in around 1:00 p.m. Did
3 I get that wrong? It's okay. I get things wrong.
4 A. No. So on the second day, the decision
5 was made about midnight to do the mutual aid
6 request, that would have been on Friday night.

7 On Saturday I had to sleep at some
8 point. I was getting off 5:00, 6:00 in the
9 morning and I left one of my sergeants in charge
10 to be -- stand in my place while I was sleeping
11 for a few hours every day. So I would get back as
12 early in the afternoon as I could.

13 When I came in in the afternoon on
14 Saturday, the discussion was -- because it's about
15 a five-hour proposition to do the mutual aid
16 request. So we put the request out, it takes a
17 couple hours for agencies to respond and then to
18 get their people to the staging area where we're
19 going to do our traffic briefing and deploy them.
20 And then once -- the briefing itself takes about
21 an hour. And then once we would deploy them, the
22 inner perimeter took an hour and a half to put in
23 place, depending on the resistance we got from the
24 crowds as we were trying to work our way around

1 with these officers. And about two hours to put
2 the outer perimeter in place. So in addition to
3 the mutual aid, you know, we're trying -- as day
4 three and on, four and five goes on, now I'm
5 integrating dozens of National Guard troops,
6 Franklin County Engineer dump trucks, ODOT crews.
7 You know, I can't close the freeway ramp with a
8 cruiser. So I had to bring in Traffic Emergency
9 Response Team from City of Columbus and from the
10 State to put up the arrows and the long tapers of
11 cones, you know, to make it safe for the motoring
12 public. I just can't put a cruiser across the
13 ramp and say it's closed all night.
14 Q. Right. Right. Okay. Just back to
15 that Saturday, the third day of the protests. So
16 you made the request around 1:00. And I get it,
17 that takes some time to implement?
18 A. I just want to clarify on the time. I
19 don't -- I probably have it in my log or my notes
20 anywhere, but I don't know exactly the time. It
21 was sometime in the afternoon that gave us three-
22 or four-hour leeway before the 5:30 roll call
23 time. I can tell you that.
24 Q. Cool.

1 Do you know -- do you know the -- do
2 you know if any streets had been closed earlier in
3 the day on Saturday before you decided to seek
4 mutual aid?
5 A. They had not.
6 Q. Okay.
7 A. No roads were closed. There was
8 protests throughout the day, but they stayed on
9 the statehouse grounds.
10 Q. Okay. If they had stayed off the
11 grounds, if they had gone into the street, would
12 roads have been closed?
13 A. Yeah. My first shift sergeant was
14 there monitoring it with -- and he had first shift
15 freeway patrol, all the motors and all of second
16 and third shift freeway I put on the same hours
17 starting, like, the second day. So everybody was
18 coming in at like 4:30, 5:00 in the evening except
19 for first shift motors. We were all working
20 12-hour -- I'm sorry, except for first shift
21 freeway. And all the people assigned to me were
22 at least 12-hour shifts at that point.
23 So had they had a need to implement
24 some kind of an emergency traffic plan like we

1 ultimately came up with later this summer, he
2 would have had 10 cruiser to do that with.
3 Q. Okay.
4 A. He could also have pulled from patrol
5 if he needed to. To my knowledge, he never
6 implemented any kind of traffic pattern before I
7 got into work in the afternoon.
8 Q. Got it.
9 Okay. Just -- and my guess this is not
10 your area, but I just want to see what falls
11 within traffic and what doesn't. Does your -- I
12 keep wanting to say the organization you're in
13 charge of, which is obviously incorrect. So --
14 but does your -- does your -- what you control,
15 would you ever have any involvement in clearing
16 people out of an area to allow traffic to come
17 through? For example, if I have a bunch of
18 protesters in an intersection, would you ever have
19 -- excuse me. I can't talk.
20 If I had a bunch of protesters jamming
21 up an intersection or -- would you ever -- would
22 it ever be your responsibility to send people in
23 to clear them out of there to make sure traffic
24 could go there?

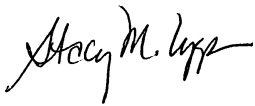
1 A. No. Never. And I would coordinate --
2 so I was -- me, personally, was generally in the
3 emergency operations center most of the time. I
4 went out every day starting day 3 and did an
5 hour-long briefing with all the troops, mutual
6 aid, National Guard, whoever, my guys, whoever was
7 there, instructions for the day, what radio
8 channels and all those kinds of things. And the
9 instructions to traffic -- well, first of all, we
10 wouldn't put the traffic plan in that intersection
11 if it was occupied by protesters or rioters.
12 Q. Right.
13 A. And second of all, for the course of
14 the shift I instructed everybody working traffic
15 that, A, I wanted them to wear a helmet or have it
16 close by because we had -- I had nine damaged
17 cruisers from rocks and bricks being thrown
18 through the windows. And I instructed every
19 officer to have a gas mask on because we were not
20 going to abandon the traffic post just because
21 there was gas in the area. They were also
22 instructed though should a crowd approach their
23 intersection or it became unsafe at any point,
24 they were to back off and let the crowd have it.

1 The primary goal was to keep innocent traffic out
 2 of there, you know, to prevent the rioters from
 3 being resupplied and all of those types of things.
 4 We can black off two blocks, let the crowd go
 5 through. And when the crowd is clear, put the
 6 traffic plan back in place again. That's what I
 7 instructed and that's what always happened.
 8 Q. Got it.
 9 And that was from the beginning of the
 10 protests?
 11 A. That was from Day 1.
 12 Q. If it's okay with everybody, I do have
 13 some more, but I'm hoping to be as efficient as
 14 possible. And it would do me a lot of good in
 15 terms of timing to take a quick break. Would that
 16 be all right everyone? Do you want to reconvene
 17 at, say, 3:10? Would that be all right?
 18 A. Fine by me.
 19 Q. Yeah.
 20 (A short recess is taken.)
 21 BY MR. FORMAN:
 22 Q. Okay. With regard to traffic, the
 23 decision to bring in mutual aid, was that decision
 24 that you had the ability to make independently?

1 for me, I had them working hours something like
 2 4:30 p.m. to 4:30 a.m. I staggered it on some
 3 days so that third shift would be there to relieve
 4 in the morning so they weren't all coming in at
 5 4:30. But a roll call time would be 5:30.
 6 Logistically though, I wouldn't let the motorcycle
 7 officers bring down motorcycles, just because
 8 they're not protected, so it limited the number of
 9 vehicles I had. And then about -- I don't know --
 10 three or four or five days past May 28th, I was
 11 able to get at least four or five -- maybe six
 12 even plain cars from our impound lot to give to
 13 the motorcycle officers so at least they could
 14 drive a car to the location. So any given day, 10
 15 officers and a sergeant during the daylight hours,
 16 that general period. And 35 or so officers and
 17 four sergeants at night.
 18 Q. Okay. Thank you. Just one second
 19 here. Most attorneys would tell you they just
 20 have a few more questions. That's not true. But
 21 I try to keep my word on things like that.
 22 So do you have any idea for how many
 23 mutual aid entities were called for assistance
 24 during the protests?

1 A. Probably not. And it all times was
 2 made by an incident commander.
 3 Q. Okay. Fair enough.
 4 Do you have any feel for the -- if you
 5 were to bring in a bunch of mutual aid officers,
 6 if that would incur additional expense for the
 7 department?
 8 A. At no extra expense for the department.
 9 Q. Okay. And I think you may have said
 10 this earlier, but I'm just trying to figure out at
 11 a given time the amount of officers which would be
 12 available to you -- I mean, you told me how many
 13 people work for you. But I assume that they also
 14 get to sleep periodically. So the officers that
 15 were available to you, about how many -- I'm just
 16 saying without calling in mutual aid, about how
 17 many officers would you have access to and
 18 vehicles to effectuate a shutdown of traffic in an
 19 area of the city?
 20 A. So because it's 24 hour a day, I had to
 21 have officers there. I had first shift, so nine
 22 -- I'm sorry, 10 officers and a sergeant that
 23 worked, like, 6:30 a.m. to 6:30 p.m.
 24 approximately. And then everybody else that works

1 A. Do you mean about agencies?
 2 Q. Yeah. Yeah.
 3 A. It was right around 35 approximately,
 4 35, 38, something like that.
 5 Q. Okay. Are there any particular
 6 difficulties with closing down the downtown area
 7 of the city as opposed to other areas?
 8 A. I'm not sure I understand the question.
 9 I mean, every area is going to have its own
 10 challenges. Usually we close it at night so that
 11 it wasn't a large work crowd or, you know, that
 12 kind of thing if that's what you're asking.
 13 Q. Yeah, I think so. You wouldn't say
 14 it's any harder to close down a downtown area than
 15 some other area of the city; is that a fair
 16 statement?
 17 A. Well, yeah, depending on the time of
 18 day and what's going on downtown, you know, if
 19 people are working downtown and there's rush hour,
 20 then obviously that's a big hit. If I had to
 21 close down the area around Ohio State campus
 22 depending on what's going on, that could be a big
 23 hit. You know what I mean?
 24 Q. Right. But if it's not rush hour,

<p style="text-align: right;">Page 46</p> <p>1 would that be -- it's not much harder than 2 anywhere else in the city? 3 A. That's probably fair. 4 MR. FORMAN: Okay. I think we're all 5 set. Alana, can -- I'm going to ask you for those 6 written traffic plans. 7 MS. TANOURY: The traffic plans. Okay. 8 Can you send me an e-mail with the -- 9 MR. FORMAN: I will totally have 10 somebody send me an e-mail to remind me to send 11 you an e-mail, so, yes, for sure. 12 MS. TANOURY: Okay. I mean, there is 13 so much discovery in this case, so the extent you 14 can get it to me in writing, that would be 15 helpful. 16 MR. FORMAN: Absolutely. I totally get 17 it. I hear you. Yes. I see the traffic. So 18 yeah, that's all I have. Thank you so much for 19 sitting through this. I really appreciate it, 20 everyone. 21 A. You're welcome. 22 Just to clarify one point on the 23 traffic plans. 24 Q. Sure.</p>	<p style="text-align: right;">Page 48</p> <p>1 ----- 2 Thereupon, the foregoing proceedings 3 concluded at 3:20 p.m. 4 ----- 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>
<p style="text-align: right;">Page 47</p> <p>1 A. So I have, like, a map for the bigger 2 perimeters and stuff. But what you're probably 3 going to see or what you're asking for is like the 4 rosters, which lists locations by who was assigned 5 where. 6 Q. Okay. 7 A. I assume that's what you're asking for. 8 Q. Yeah. But there is a map? 9 A. Yeah. I have a handwritten map that 10 doesn't really -- it's not what you're looking for 11 probably. I can -- you're welcome to it, but it's 12 Xs on a -- and highlighted lines on a black and 13 white piece of paper. The actual locations are 14 recorded on the daily rosters. 15 Q. Okay. Yeah. I'll take a look at that. 16 But you're right. It may be beyond my feeble 17 intellect. I would not be surprised. 18 A. It's pretty rough, the map. 19 Q. All right. Cool, everyone. Well, you 20 guys take care, all right? 21 A. Thanks. 22 MS. TANOURY: Thanks. 23 MR. FORMAN: Thank you very much. 24 (Signature not waived.)</p>	<p style="text-align: right;">Page 49</p> <p>1 State of Ohio : C E R T I F I C A T E County of Franklin: SS 2 3 I, Stacy M. Upp, a Notary Public in and for the 4 State of Ohio, certify that Lieutenant Paul Weiner 5 was by me duly sworn to testify to the whole truth 6 in the cause aforesaid; testimony then given was 7 reduced to stenotype in the presence of said 8 witness, afterwards transcribed by me; the 9 foregoing is a true record of the testimony so 10 given; and this deposition was taken at the time 11 and place specified on the title page. 12 13 Pursuant to Rule 30(e) of the Federal Rules of 14 Civil Procedure, the witness and/or the parties 15 have not waived review of the deposition 16 transcript. 17 I certify I am not a relative, employee, 18 attorney or counsel of any of the parties hereto, 19 and further I am not a relative or employee of any 20 attorney or counsel employed by the parties hereto, 21 or financially interested in the action. 22 IN WITNESS WHEREOF, I have hereunto set my hand 23 and affixed my seal of office at Columbus, Ohio, on 24 February 23, 2021.  20 Stacy M. Upp, Notary Public - State of Ohio My commission expires August 6, 2021. 21 22 23 24</p>

Witness Errata and Signature Sheet

Correction or Change Reason Code

1-Misspelling 2-Word Omitted 3-Wrong Word

4-Clarification 5-Other (Please explain)

Page/Line Correction or Change Reason Code

_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

I, Paul Weiner, have read the entire transcript of my deposition taken in this matter, or the same has been read to me. I request that the changes noted on my errata sheet(s) be entered into the record for the reasons indicated.

Date_____Signature_____

The witness has failed to sign the deposition within the time allowed.

Date_____Signature_____

Ref: SU301373PW S-SU P-BW

1

1 42:11
10 24:9,12 25:5
40:2 43:22 44:14
10-cruiser 34:20
100 7:21
12-hour 39:20,22
1310 25:15
142 16:14
15-square 27:14
16 12:4 23:23
161 16:1
17 10:19
17th 16:5 22:6
1:00 33:8 36:19,
23 37:2 38:16

2

2 25:17 35:6
20 24:9,15 25:19
2020 9:22 23:17
24 12:17 34:10
43:20
28th 24:24 31:22
44:10
29th 28:24 33:8
2:30 32:23

3

3 35:7 41:4
30 32:11,24
30(b) 9:14
315 15:21,22 29:1,
6 32:24 36:2
35 44:16 45:3,4
38 45:4
3:10 42:17
3:20 48:3
3:30 32:23

4

45 9:9
4:30 39:18 44:2,5

5

5,000 30:24
5:00 37:8 39:18
5:30 30:14 32:13
38:22 44:5
5th 9:22

6

670 16:2 29:6 36:1

6:00 37:8
6:30 10:19 43:23

7

70 15:22 16:9
29:1,6 32:22 36:1
71 16:1,4,14,17
22:6 23:4 29:6
36:1
7:00 30:17

8

8:30 32:3

9

96 35:15,18,22
9:30 32:9

A

a.m. 43:23 44:2
abandon 41:20
ability 42:24
absolutely 7:11
11:17 19:21
28:20 36:12
46:16
access 43:17
accident 14:20
15:3 19:4,8 22:8
accidents 22:11
actual 26:23
47:13
add 16:19
addition 38:2
additional 43:6
address 36:4
adds 26:11
administration
5:6
affected 17:20
20:4
afternoon 33:9
35:7,10,11 37:12,
13 38:21 40:7
agencies 34:4,6,
16 37:17 45:1
agreements 9:16
ahead 11:6
aid 9:16,20 10:3
30:15 34:8,10
35:4,13,14 37:2,
5,15 38:3 39:4
41:6 42:23 43:5,
16 44:23
AIU 15:7
Alana 5:13 46:5
alley 35:1
alleys 33:1

amount 31:13
43:11
and/or 14:13
35:18
animal 27:1
appreciative
16:18
approach 41:22
approval 30:18
34:8 35:11
approximately
9:9 25:24 34:10
43:24 45:3
area 8:18 17:20
18:23 20:4 22:8
24:21 26:12
27:14,17,18,23
28:15 29:20,22
30:1,3 32:15
33:22 36:8,12
37:18 40:10,16
41:21 43:19 45:6,
9,14,15,21
areas 45:7
arrange 13:9
arrangements
9:19
arrival 15:2
arrives 19:20
arrow 21:9,14
arrows 38:10
arterial 12:16
13:8,18 16:20
assigned 34:17
39:21 47:4
assistance 44:23
assume 6:22
19:16 28:6 43:13
47:7
attend 11:22
Attorney's 5:16
attorneys 44:19
August 25:6
awesome 28:3

B

back 15:20,22
16:2 20:5 21:19
33:8 37:11 38:14
41:24 42:6
background
17:22
bad 17:7
barrels 21:15
barricades 20:24
barring 20:1
based 19:2 30:11,
22 35:22
basis 22:23
began 24:24
26:14

begin 6:3,12
beginning 42:9
behalf 5:12,14
9:13,17
belt 29:5 35:24
Bicentennial
33:15
big 45:20,22
bigger 17:18 25:3
35:9 47:1
bikes 29:22
bit 6:14 9:2 10:8
12:9 15:11 18:5
21:2 23:18 25:19
31:11,12,21
black 42:4 47:12
block 27:14
blocking 20:2
21:3
blocks 18:22 28:8
42:4
boards 20:24
21:9,14
born 25:6 26:9
boss 8:24 18:20
bosses 34:3
bother 6:17
bottlenecked
27:18
break 42:15
bricks 41:17
bridge 13:2,4,6,7
briefed 30:13
34:16
briefing 34:13
37:19,20 41:5
briefly 6:8
bring 20:22 21:14
38:8 42:23 43:5
44:7
bringing 31:11
37:2
Broad 13:3,19
17:1 19:15 20:16
28:19
bunch 40:17,20
43:5
bureau 9:1
burning 33:13

C

call 9:7 10:18
12:13 19:4 20:21
21:13 24:13
30:13 38:22 44:5
called 9:14 19:17,
23 29:4 32:3,6
33:20 44:23
calling 26:7 43:16
cameras 9:24
campus 45:21

car 44:14
care 19:22 47:20
cars 24:12 29:22
32:17 33:2 35:4
44:12
case 27:7 46:13
caught 27:19 30:6
cautions 17:16
CDP 9:19,23
center 24:7 34:3
41:3
challenges 45:10
channels 41:8
charge 10:11
11:23 14:11 37:9
40:13
check 8:4
chemical 18:19
chief 18:20 24:11
25:11 26:4,5
city 5:15 7:22
9:12,13 10:16
11:4,9,20 14:1
16:8 18:10 21:13
22:22 24:13
26:10,12 28:8
33:16 38:9 43:19
45:7,15 46:2
Civil 9:14
clarify 7:9 38:18
46:22
clear 7:7 19:23
29:5 33:15 40:23
42:5
clearing 40:15
Cleveland 13:19
close 13:4 20:8,
10,24 21:10 23:9
24:20 33:11 38:7
41:16 45:10,14,
21
closed 12:7 15:15
19:9 21:22 24:10,
14 25:21 36:2,20
38:13 39:2,7,12
closing 15:10
45:6
closure 12:13,15
14:14,15 15:19
20:7 23:6
closures 17:18
20:20 21:7,15
colored 25:16
Columbus 7:22
8:14 9:12 15:17,
18 29:24 38:9
commander 8:24
9:1 24:11 30:18
34:9 35:12 43:2
commanders
25:13
commercial 8:21
10:20
Commons 29:24

complex 25:19
compliance 9:23
concept 15:11
concluded 48:3
condition 14:24
 15:1
cone 25:20
cones 21:1,11,15
 24:9,15 25:19
 38:11
conference 5:16
confused 28:12
constantly 26:3
containment
 18:23 27:23
continue 20:16,17
 25:8
control 29:20
 33:12 40:14
convoys 34:20
Cool 38:24 47:19
coordinate 12:18
 23:23 41:1
coordinator 11:1
correct 8:16
counsel 5:2
countermeasures
 10:21,23
**countermeasures/
 training** 9:7
County 16:11,12
 34:5 38:6
couple 6:13 9:13
 27:9 37:17
court 7:8
cover 33:1
crash 12:14,24
 13:1 14:18,19
 16:9 19:15 20:4
crashes 11:12
create 25:12
created 22:21
 23:20 24:22
creation 11:19
crews 21:14 38:6
critical 15:1 29:18
**CROSS-
 EXAMINATION**
 6:1
crowd 30:22,24
 41:22,24 42:4,5
 45:11
crowds 32:17,18
 37:24
cruiser 21:5,23
 38:8,12 40:2
cruisers 21:21
 35:15,18 41:17
cut 17:13

D

daily 47:14
damaged 41:16
dangerous 24:18
day 10:18 12:17
 23:23 28:2,23
 29:6 30:14 31:5
 33:9 35:6,7,13,14
 36:17 37:4,11
 38:3,15 39:3,8,17
 41:4,7 42:11
 43:20 44:14
 45:18
day-to-day 10:14
daylight 44:15
days 25:9 26:14
 27:9 30:12,14,23
 44:3,10
deal 8:11 28:16
dealt 15:14 19:19
debating 14:18
decided 27:12
 30:2 35:23 39:3
decision 37:4
 42:23
declared 35:20
defendants 5:14
deliveries 36:6
demand 35:12
demonstrations
 9:21
department 10:11
 18:14 19:18 43:7,
 8
departments
 31:12
depend 18:18
 20:20
depending 20:19
 37:23 45:17,22
deploy 37:19,21
deposed 7:2
deposition 5:5,7
deputy 24:11 26:5
describing 28:7
designated 9:12
 10:2,3 17:24
determine 13:6
 14:20 20:11
determined 15:2,
 6
detouring 16:23
detours 13:10
develop 33:9
diagram 25:20
difficult 17:19
 33:6
difficulties 45:6
direction 18:19

dirt 29:22
discovery 46:13
discussed 34:7
discussion 37:14
discussions
 35:11
division 7:23 8:14
 9:17 10:23 19:24
doughnuts 29:23
downtown 28:8,
 11,16 29:20 30:1
 33:22 34:12 36:2,
 6,8 45:6,14,18,19
dozens 38:5
drive 44:14
driving 29:21
 32:17
duly 5:21
dummies 25:14
dump 16:4 38:6
duty 32:8,10

E

e-mail 46:8,10,11
earlier 23:7 32:22
 35:13 39:2 43:10
early 23:14,21
 35:10 37:12
east 16:9,14
 20:15 29:2 33:16
Eats 36:6
Ed 5:9 17:21
effectuate 43:18
efficient 42:13
effort 31:16
egress 27:20
emergency 12:13
 14:4 20:21 24:7
 30:8 34:2,15
 35:21,22 38:8
 39:24 41:3
employer 7:17,19,
 22 8:14
end 7:21
ended 34:2
enforced 21:24
enforcement 8:21
 9:6,20 10:12,20
Engineer 38:6
engineering
 20:23
engineers 13:5
 21:13 24:14
entire 10:16,23
 32:12
entities 9:20
 11:11 44:23
EOC 25:12
essentially 9:18
 22:2 32:13

established 29:19
estimated 30:24
evaluate 23:1
evening 32:3
 39:18
event 12:14 24:3
events 11:16 14:3
eventually 31:23
evolved 31:19
evolving 34:15
exclusively 10:3
excuse 40:19
existing 22:7
exit 36:1
expanded 29:3,4
expense 43:6,8
express 5:4
extent 46:13
extra 21:14,15
 43:8
extremely 33:6

F

fact 24:6
fair 14:11 43:3
 45:15 46:3
fall 11:14
fallout 18:24
falls 40:10
fast 20:1
faster 30:20
fatal 12:14,24
 14:19 15:13
feeble 47:16
feel 6:16 9:3
 31:13 43:4
felt 30:19
field 33:5 34:1
figure 19:18 20:12
 43:10
filtering 17:19
fine 18:6 42:18
fire 18:16,20
 27:21 30:5 34:6
 36:11
fire's 19:2
five-hour 37:15
five-minute 20:6
flanks 32:16
flowing 17:15
 27:18
Floyd 9:22
fluid 34:14
fly 27:6,8
force 9:24
forces 33:5 34:1

foregoing 48:2
forgive 11:2
Forman 5:8,9 6:2
 8:6,8 18:1,7
 42:21 46:4,9,16
 47:23
fortunate 15:17
four-hour 38:22
Fourth 17:13 29:2
 31:2 32:24 33:16
Franklin 34:5 38:6
free 6:16
freeway 9:5
 10:15,16 12:12,
 16 15:13,21,23
 16:3,6 17:6 21:7,
 10 23:9 32:9,10
 38:7 39:15,16,21
freeways 8:20
 15:16
Friday 33:7 37:6

G

gaps 35:4
gas 41:19,21
gave 38:21
Gay 20:10 25:18
general 15:16
 17:12 44:16
generally 12:12
 15:20 19:23 21:5
 23:1 24:16 30:13,
 17 41:2
George 9:22
give 10:8 12:21
 18:9 44:12
giving 17:21
Glenwood 13:3
goal 27:14 42:1
good 17:4 29:10
 42:14
Goodale 15:21
Grant 30:6
gravity 32:4
great 7:1,4 10:9
 13:11
gridlocking 31:4
grounds 39:9,11
growing 35:8
Guard 30:16
 35:19 38:5 41:6
guess 11:18
 13:14 14:10
 15:12 18:1 22:1
 28:5 31:9,15,17
 40:9
guidelines 21:16
guys 35:2 41:6
 47:20

H

half 14:17 15:5
21:11 37:22
hall 22:22 26:10,
12 33:16
handle 11:3
13:21,22 16:23
17:2
handled 11:20
handwritten 47:9
happen 19:11
happened 42:7
happening 36:17
happy 8:11
hard 23:3
harder 45:14 46:1
hazardous 13:1
19:6
HAZMAT 12:14
15:24 18:23 23:5
head 7:6 15:11
18:4
health 7:14
hear 7:21 8:10
32:6 46:17
held 32:10
helmet 41:15
helpful 23:10 31:8
46:15
hey 17:21 18:21
20:8 26:5 33:21
high 19:16 20:3,9,
10 28:19 31:2
32:18 36:20
highlighted 47:12
Highway 16:12
34:5
highways 15:18
hit 45:20,23
hold 14:19
home 32:7
hoping 42:13
hospital 14:24
15:2 30:6 36:5,13
hour 14:17 15:4,
19 37:21,22
43:20 45:19,24
hour-long 41:5
hours 10:19 12:17
13:5,8 14:8,17,22
21:17 23:23 29:7,
11,12,14 37:11,
17 38:1 39:16
44:1,15
Hudson 16:5,17

I

idea 28:21 29:13
36:18,19 44:22

identifiable 10:1
identified 9:15
identify 5:2,3
ignorant 11:2
immediately
21:19
implement 38:17
39:23
implementation
12:1 28:6
implemented
30:16 31:23 40:6
impossible 27:12
33:18
impound 44:12
impromptu 32:21
incidence 12:7
incident 12:14,20,
22 15:12 30:18
34:8 35:12 43:2
included 28:18
including 9:22
incorporate 26:12
incorrect 40:13
incur 43:6
independently
42:24
Individual 13:20
individually 7:13
individuals 10:10
11:4
ingress 27:20
inhibit 7:14
initial 26:18
initiate 26:7
injury 14:18 20:2
innocent 27:16
28:1,13 32:15
42:1
instructed 41:14,
18,22 42:7
instructions 41:7,
9
integrating 38:5
intellect 47:17
intensive 25:4
intersection 19:9
25:18 28:19
40:18,21 41:10,
23
intersections
35:3
investigation
14:20,21 15:4
involved 11:5,7,
15,18,21 20:20
21:4 23:5,20
31:14
involvement 12:8
40:15
involving 13:1

issue 7:14 12:19
issues 9:13

J

jamming 40:20
job 7:1,4
junction 15:20
June 23:14,22
25:3

K

kill 9:21
kind 10:8,24
15:17 17:2,12,14,
23 18:4 20:2 23:6
24:2 25:13 27:22
29:17 33:18
34:16 39:24 40:6
45:12
kinds 41:8
knowledge 40:5

L

labor 25:4
lack 25:14
lane 21:10
large 11:24 28:15
45:11
larger 27:23
largest 35:14
late 23:14 26:16,
17 32:20
law 9:20
led 34:21
leeway 17:22
38:22
left 37:9
legs 22:18
length 20:19 23:6
level 31:10,16
lieutenant 5:15,20
6:5,7 8:17,20
18:21
lieutenants 14:13
33:20
life 15:7
limited 24:21 44:8
lines 47:12
listening 32:5
lists 47:4
literally 23:22
25:15 34:22
live 16:17 17:17
loads 15:24
location 44:14
locations 22:17
24:12 47:4,13

lock 30:2 34:18
log 38:19
Logistically 44:6
long 25:22 33:9
38:10
long-term 21:7
looting 33:13
lot 11:10,22 14:23
34:11,22,23
42:14 44:12
lots 33:2

M

made 37:5 38:16
43:2
Madison 16:11,12
main 12:16 13:17
17:14
major 11:11 13:8
15:20,23 16:7
35:3
make 17:18
21:20,23 35:12
38:11 40:23
42:24
makes 15:9,14
16:16
man 21:22
map 25:16 47:1,8,
9,18
mask 41:19
materials 13:1
matter 24:6
Mattie 5:10
Mayor 35:20
means 13:14
media 30:5 36:11
medication 7:13
medics 27:21
meet 34:11
meeting 34:6
meetings 11:10,
22 26:2
Memorial 34:12
memory 7:15
mentioned 10:12
12:7 23:7,12
24:22 28:14
36:16 37:1
met 6:7 34:15
mid 10:18 26:17
middle 19:15
midnight 33:11
37:5
mile 21:11
minimal 7:20
mission 29:17
monitoring 39:14
Moore 8:24

morning 32:13,23
37:9 44:4
Morse 13:18 16:5
23:4
motor 10:19
motorcades
22:14
motorcycle 9:6
32:7,8 44:6,13
motorcycles 8:20
10:17 44:7
motoring 24:19
38:11
motorists 31:4
motors 39:15,19
moved 35:24
movement 27:11
moving 32:14
33:5
mutual 9:16,20
10:3 30:14 34:8,
10 35:3,13,14
37:1,5,15 38:3
39:4 41:5 42:23
43:5,16 44:23

N

nasty 22:5
National 30:16
35:19 38:5 41:6
necessity 30:12
needed 29:8 40:5
neighborhood
17:1,17
neighborhoods
13:20 17:16
NHTSA 21:12,16
night 29:3,18
31:24 32:2,9,12,
20 33:7,10 34:9,
13 35:10,20,21
37:6 38:13 44:17
45:10
nod 7:5
nonessential 30:5
nonlethal 9:24
north 16:1,4
20:15,16 28:22
32:24
northbound
15:21 20:9,14
31:1,2
notes 38:19
notified 12:18
13:24 14:7,10,15
18:12
notify 14:23 20:7
number 33:23
35:16 44:8
numbered 25:16
numerous 28:8
nutshell 14:12

O

oath 5:6,17
obvious 25:7 35:7
occupied 41:11
ODOT 21:13 38:6
office 5:10,15,16 16:13
officer 13:21 19:10,20,22 41:19
officers 9:9 10:19, 21 30:15 31:13 32:7,12,16 33:4, 24 34:10 35:18, 22 38:1 43:5,11, 14,17,21,22 44:7, 13,15,16
official 14:1
offsite 34:11
Ohio 16:12 34:5 45:21
onlookers 10:1
opened 20:1
operate 23:7
operated 32:18
operating 29:23
operations 8:19 10:14 24:7 34:3 41:3
opposed 45:7
option 16:7
order 18:2
organization 40:12
original 22:19
originally 19:19 37:1
outer 29:5 35:23 36:9 38:2
oversee 10:22
oversized 15:24
overtime 32:11
overview 10:8
OVI 8:21 9:6,7 10:12,21,22

P

p.m. 36:19,23 37:2 43:23 44:2 48:3
painless 6:11
paper 47:13
Park 33:15
parking 33:1 34:22,23
part 23:22 33:22
partners 16:11
parts 22:18 30:7

past 44:10
patrol 9:5 10:15, 16 13:21 16:12 18:21 20:22 26:6 33:20,24 34:5 39:15 40:4
pattern 25:20 28:10 40:6
patterns 11:8 12:19
Paul 5:20 6:5
peak 29:7,10,11, 12,13,14
people 17:17 18:3 22:9 30:6,11,24 33:1,12,23 37:2, 18 39:21 40:16, 22 43:13 45:19
percent 7:21
perimeter 27:10, 13 28:24 29:4,5, 19 32:14,21 33:19 34:19 35:23,24 36:9,10, 11 37:22 38:2
perimeters 47:2
period 26:19 29:15 36:21 44:16
periodically 43:14
person 31:15
personally 10:1 41:2
personnel 9:20
philosophy 23:8
phrase 28:2
piece 47:13
place 5:6 22:3,7 36:3 37:10,23 38:2 42:6
places 25:21
plain 44:12
plaintiffs 5:12
plan 22:19 23:4 24:8 25:4,12 26:6,9 28:6 30:17 31:14,23 32:2 39:24 41:10 42:6
planned 24:4
planning 11:8
plans 22:3,7,16, 21 23:13,19,24 24:1,23 25:1,2 26:19,23 27:1,2,3 33:10 46:6,7,23
plug 35:4
point 8:11 14:14 15:15 17:4 22:20 24:19 26:3 27:12, 22 28:14 37:8 39:22 41:23 46:22
police 7:23 8:14 9:17,21 11:3 19:16,18 27:16

30:5 36:11
policies 9:23 14:1,5
policy 11:19,22, 24 19:23
portion 36:21
possibly 6:11
post 25:15,17 41:20
posts 24:9 25:5 26:11 34:18
potentially 35:8
power 31:15
practical 18:13
pre-plans 22:2
predesignated 24:20
predesignates 24:8
preliminary 6:13
prepared 10:5
present 7:17,19, 22 8:13
presently 8:22
presidential 22:12,13
pretty 36:11 47:18
prevent 30:3 32:17 42:2
primary 42:1
principle 17:12
problem 8:1 19:13 20:13 35:9
Procedure 9:14
proceedings 48:2
process 18:12 21:3
programs 11:1
progressed 30:13
proposition 37:15
protect 27:15 32:16
protected 44:8
protest 22:20 23:13 24:5,15,17, 20,24 26:18 29:7, 10
protesters 24:18 27:10,15 40:18, 20 41:11
protesting 26:24
protests 23:14,21 24:3 25:8 26:3,14 27:19 28:16 31:24 38:15 39:8 42:10 44:24
provide 27:20
public 24:19 38:12
pull 22:16 33:24
pulled 32:9 40:4

purview 11:14
put 16:13,14,24 23:12 25:1,12,21 26:6 27:5,8,13 32:20 34:20 37:16,22 38:1,10, 12 39:16 41:10 42:5
putting 29:24

Q

question 6:15,22 7:11 14:11 19:12 45:8
questions 6:10,13 44:20
quick 6:11 19:23 42:15
quickly 6:15 25:1
quieted 24:2

R

radio 32:5 41:7
ramp 38:7,13
random 36:7
reach 16:11
reached 34:9
reaching 34:7
readily 9:24
realize 20:6
reason 36:8
recess 8:7 42:20
recklessly 29:23 32:19
recommendation 19:3
reconvene 42:16
record 5:3 6:4,8 7:8 8:5
recorded 34:16 47:14
recurring 22:23
referring 23:13
regard 11:19 14:2 42:22
release 15:5
relieve 44:3
rely 18:16
remember 31:22
remind 46:10
remote 5:6,7
repeated 26:24
rephrase 6:17
replace 21:21
report 8:22
reported 19:9
reporter 5:1 7:8
reporting 5:7 11:5

reports 9:3
represent 5:3
request 35:13 37:6,16 38:16
reroute 17:10 22:9
resident 36:13
residential 13:17
resistance 37:23
resources 26:8
respond 11:11 12:18 15:6,7,8 34:10 37:17
responding 14:13 19:21
response 12:14 14:4 20:21 35:14 38:9
responsibility 40:22
responsible 14:14
result 12:15
resupplied 29:21 42:3
resupplying 32:19
Rettig 5:10
riot 29:7
rioters 27:10 29:21 32:19 33:5 41:11 42:2
rioting 26:23
riots 26:19 27:7 28:24 32:14
risk 30:1
road 12:17 13:2, 13,18 16:5,10,15 18:11 21:21,22 24:9,14 25:21 26:15
roads 16:20 17:5 36:3 39:7,12
rocks 41:17
roll 30:13 38:22 44:5
Rome-hilliard 16:10,15
room 5:4,9,17
rosters 47:4,14
rough 47:18
roughly 10:18
route 16:7,14 20:13
roving 27:19
rule 9:14 15:16
rules 21:12
run 15:18
rush 31:5 45:19, 24

S

safe 21:8,20
38:11
Saturday 24:5
26:4,13 35:9,20
37:7,14 38:15
39:3
scenario 16:21
18:15 19:1
scenarios 18:17
scene 19:10,17
secondary 12:16
13:2,13 16:20
17:5 18:11 36:3
section 8:20
sectioned 28:15
seek 39:3
send 20:14 40:22
46:8,10
sense 15:9,14
16:16
separate 5:16
sergeant 9:7
10:22 20:7,8
39:13 43:22
44:15
sergeants 9:4,6,8
10:20 32:8 34:14,
21 37:9 44:17
series 6:9
set 21:18 30:11
46:5
setting 31:14
shaking 7:6
Sheriff's 16:13
shift 9:5 10:16,17
32:8,10,11 39:13,
14,16,19,20
41:14 43:21 44:3
shifts 10:15 39:22
short 8:7 42:20
shows 25:15
shut 14:2 15:22,
23 16:3,5 20:3
24:16 33:21
shutdown 18:17
43:18
shutting 11:15
side 16:9
sign 20:24 21:22,
23
signature 47:24
signs 24:10,15
25:21
similar 22:17
single 10:24
sir 8:16 12:2
23:15 26:8 28:17
sit 11:10
sitting 46:19

situation 17:7
23:2 30:12 32:5
size 30:24
sleep 37:7 43:14
sleeping 37:10
slightest 6:18
solid 27:13
sort 12:22 27:5
31:10
sought 37:1
soundness 13:7
south 18:22
southbound
20:10,17 34:24
35:2
speak 9:12,19
speaking 9:16
10:2,3 23:1
speeds 32:18
spill 13:1 18:10,
12
spilled 18:19
spills 24:17
spinoff 26:10
spontaneously
26:8
Spring 29:1 31:2
32:22 33:15
staggered 44:2
staging 37:18
stand 37:10
standard 18:9
start 20:5 27:22
started 28:13 32:4
36:18,22
starting 17:4
22:20 28:23 29:2
35:19,20,21
39:17 41:4
starts 20:5
state 5:3 16:7,12,
13 20:9,15 27:11
34:5 38:10 45:21
statehouse 22:22
24:5,8,16,21
27:24 39:9
statement 45:16
statements 7:5
stating 6:4
stayed 39:8,10
steps 18:13
19:11,18
stipulate 5:11,17
stipulation 5:5
stop 6:16
street 12:16 13:3,
9,19 17:1 19:24
20:3,9,10,11,15,
16 21:4 24:18
29:1,2 30:22
31:2,3 32:22,24

33:15 36:20
39:11
streets 11:15
13:17,18,19
16:20 33:17 39:2
strictly 36:11
strike 11:6
strikes 13:3
striking 13:2
stringent 36:9,10
struck 13:3
structural 13:6
structure 9:3
stuff 47:2
suggested 34:7
summer 26:17
40:1
Summit 17:8
Sunday 35:19
supervise 8:18
10:10
supervisor 10:24
13:21
supervisors
14:13
surprised 47:17
survive 15:3
SUVs 29:22
swear 5:1
sworn 5:21
system 10:17
16:3
systems 12:12

T

table 20:22
takes 25:19
37:16,20 38:17
taking 5:17 12:6
17:6
talk 6:14 15:9
17:5 40:19
talking 13:16
28:13 31:11,16
Tanoury 5:13 8:4
17:21 18:6 46:7,
12 47:22
tapers 38:10
team 14:5 20:21
38:9
tear 21:19
tearing 29:23
term 22:2
terms 28:4 42:15
Terry 8:24
TERT 12:13
testifies 5:21
testify 10:5

thing 12:11 18:13
20:2,12,18,22
45:12
things 10:13
11:12,23 14:16
21:1 22:12 23:7
24:2 27:21 33:13
37:3 41:8 42:3
44:21
thoroughfares
13:18 17:14
threatening 15:7
three- 38:21
thrown 41:17
Thursday 31:24
time 14:16 21:18
25:11 26:5,20
29:15 36:20,21
38:17,18,20,23
41:3 43:11 44:5
45:17
timeline 31:19
times 6:14 12:4
14:23 43:1
timing 42:15
today 6:10 7:14
9:11 10:5 24:6
told 43:12
topic 17:23
totally 25:2 31:4
33:11 46:9,16
toxic 18:9
traffic 8:19 9:1,17
10:4 11:3,8,11,20
12:7,13,19,24
14:2,4 15:10,14
16:3,4,13,23,24
17:3,10,15,19
18:4,5 19:1,15
20:5,13,14,21,23
21:13 22:8,11,21
24:8,9,14,15,17
25:5,14,19,20
26:7,11 27:16,17,
23 28:1,10,13
30:4,15,17 31:3,4
32:11,15 33:21
34:1,18,24 35:2
36:1 37:19 38:8
39:24 40:6,11,16,
23 41:9,10,14,20
42:1,6,22 43:18
46:6,7,17,23
trainer 11:1
transported 15:1
troops 38:5 41:5
truck 13:2
trucks 15:24 38:6
true 44:20
turn 8:2 27:16
turned 32:15 36:5
type 18:18
types 11:12 13:19
21:1 42:3

U

Uber 36:6
ultimately 27:8
40:1
understand 6:15
7:7 31:15 45:8
understanding
18:2 32:4
understood 6:19,
22 7:10
unit 9:6
unsafe 41:23
updated 14:23

V

vehicle 10:20
30:4
vehicles 29:21
36:7 43:18 44:9
verbal 7:5
Vets 34:12
vice 22:13
victim's 14:24
virtually 5:18
visits 22:13
volume 7:20
16:24 17:2

W

W-E-I-N-E-R 6:6
waived 47:24
walk 18:11 31:18
walking 31:1
wanted 34:18
41:15
wanting 40:12
waste 18:9 19:7
watch 10:18
watched 33:9
wear 41:15
week 25:9
weekend 24:3
weeks 26:18
weigh 11:23
Weiner 5:15,20
6:5,7
west 16:8 18:22
20:14 29:1 34:12
white 47:13
wide-ranging
12:11
widespread
33:14,17
wind 18:19
windows 41:18
Woods 25:11,24

26:4

word 44:21

words 10:22

work 19:20 20:23

32:3 34:1 36:4

37:24 40:7 43:13

45:11

worked 32:14

43:23

working 39:19

41:14 44:1 45:19

works 43:24

worries 12:3

worth 21:17

Wow 35:17

wreck 15:13

writing 27:3 46:14

written 46:6

wrong 13:15 31:3

37:3

X

Xs 47:12

Y

year 23:17